ELLIOTT & ELLIOTT, P.A.

ATTORNEYS AT LAW

1508 Lady STREET
COLUMBIA, SOUTH CAROLINA 29201
selliott@elliottlaw.us

SCOTT ELLIOTT

TELEPHONE (803) 771-0555 FACSIMILE (803) 771-8010

June 1, 2012

VIA E-FILING

Ms. Jocelyn Boyd Chief Clerk of the Commission SC Public Service Commission P. O. Drawer 11649 Columbia, SC 29211

RE:

Petition of South Carolina Electric & Gas Company for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina

Docket No. 2012-203-E

Dear Ms. Boyd:

Enclosed please find for filing a Petition to Intervene filed on behalf of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/mjl

Enclosure

cc: All parties of record (w/encl.)

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2012-203-E

IN THE MATTER OF:)	
)	
Petition of South Carolina Electric & Gas)	
Company for Updates and Revisions to)	PETITION TO INTERVENE
Schedules Related to the Construction of a)	
Nuclear Base Load Generation Facility at)	
Jenkinsville, South Carolina)	

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That on May 15, 2012, South Carolina Electric & Gas ("SCE&G") filed a petition with the Commission, pursuant to S.C. Code Ann. §58-33-270(E), seeking an order approving an updated construction schedule and capital cost schedule for the Units. The updated construction schedule seeks to revise the construction plan for the Units based on the issuance of the combined operating license for the Units by the Nuclear Regulatory Commission in early 2012, not mid-2011 as originally anticipated. The Petition also seeks to incorporate approximately \$283 million in capital costs that have been incurred or have been identified since the issuance of Order No. 2011-345. This petition replaced a petition filed on February 29, 2012 which SE&G withdrew by letter dated May 8, 2012.



That SCEUC is an association organized in the State of South Carolina, consisting
of large industrial consumers of energy which are engaged in various manufacturing enterprises
throughout the State.

 That a number of members of SCEUC purchase and consume substantial amounts of electricity from SCE&G.

4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.

7. That Petitioner is represented by counsel in this proceeding as follows:

Scott Elliott, Esquire Elliott & Elliott, P.A. 1508 Lady Street Columbia, South Carolina 29201 Telephone: 803-771-0555

Fax: 803-771-8010

selliott@elliottlaw.us

WHEREFORE, Petitioner prays for the following relief:

 a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;

- That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.

() 3

Scott Elliott, Esquire ELLIOTT & ELLIOTT, P.A. 1508 Lady Street Columbia, SC 29201 (803) 771-0555

Attorney for the South Carolina Energy Users Committee

Columbia, South Carolina

June 1, 2012

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Petition of South Carolina Electric & Gas Company for

Updates and Revisions to Schedules Related to the

Construction of a Nuclear Base Load Generation Facility at

Jenkinsville, South Carolina

Docket No.: 2012-203-E

PARTIES SERVED: Jeffrey M. Nelson, Esquire

Shannon B. Hudson, Esquire Courtney D. Edwards, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900

Columbia, SC 29201

Belton T. Zeigler, Esquire

Robert Guild, Esquire

Siorre Club

Gary Pope, Jr., Esquire Sierra Club

Pope Zeigler, LLC 314 Pall Mall Street P. O. Box 11509 Columbia, SC 29201

Columbia, SC 29211

K. Chad Burgess, Esquire

SCANA Corporation

Mail Code C222

220 Operation Way

Joseph Wojcicki

Joseph Wojcicki

820 East Steele Road

West Columbia, SC 29169

Cayce, SC 29033

Matthew W. Gissendanner, Esquire

SCANA Corporation 220 Operation Way

MC C222

Cayce, SC 29033

PLEADING: PETITION TO INTERVENE BY SOUTH CAROLINA

ENERGY USERS COMMITTEE

Mary Jo Lawracy, Legal Assistant

June _____, 2012